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9 as Trustee of the Ramey Colby 2007 Trust.

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16 Attorneys for Dreyer Babich Buccola Wood Campora, LLP

17 THE UNITED STATES BANKRUPTCY COURT  
18 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 **In re:** ) Case Nos. 19-30088 (DM)

21 **PG&E CORPORATION,** ) Chapter 11

22 **-and-** )

23 **In re:** ) **DECLARATION OF STEVE M.**  
24 ) **CAMPORA IN SUPPORT OF MOTION**  
25 **PACIFIC GAS AND ELECTRIC** ) **FOR ORDER AUTHORIZING**  
26 **COMPANY,** ) **WITHDRAWAL OF COUNSEL TO:**  
27 ) **MICHAEL RAMEY; MICHAEL RAMEY**  
28 ) **AND ASSOCIATES, INC.; AND MICHAEL**  
 ) **RAMEY AS TRUSTEE OF THE RAMEY**  
 ) **COLBY 2007 TRUST**

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

\* All papers shall be filed in the lead case, No. 19-30088(DM)

JUDGE: Hon. Dennis Montali

1 I, Steve M. Campora, do hereby declare as follows in support of the Motion for Order  
2 Authorizing Withdrawal of Counsel to: Michael Ramey; Michael Ramey and Associates, Inc.; and  
3 Michael Ramey as Trustee of the Ramey Colby 2007 Trust (hereinafter referred to as the "Motion");  
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5 1. The facts set forth herein are true and within the scope of my personal knowledge, and  
6 if called upon to do so I could and would testify competently to these facts.  
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8 2. I am an attorney duly admitted to practice in the State of California. I am a partner at  
9 Dreyer Babich Buccola Wood Campora, LLP (hereinafter referred to as "Dreyer Babich"), who is the  
10 attorney of record for: Michael Ramey; Michael Ramey and Associates, Inc.; and Michael Ramey as  
11 Trustee of the Ramey Colby 2007 Trust (hereinafter collectively referred to as the "Creditors").  
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13 3. I am authorized on behalf of Dreyer Babich to make these representations in support  
14 of the Motion.  
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16 4. On January 29, 2019, PG&E Corporation and Pacific Gas & Electric Company filed  
17 petitions for relief under Chapter 11 of Title 11 of the United States Code with the United States  
18 Bankruptcy Court, in and for the Northern District of California, (hereinafter referred to as the  
19 "Court") commencing case numbers 2019-30088 (DM) and 2019-30089 (DM) (hereinafter  
20 collectively referred to as the "Bankruptcy Cases").  
21

22 5. On October 2, 2019, Dreyer Babich timely filed three (3) separate Proofs of Claim in  
23 the Bankruptcy Cases on behalf of the Creditors, which were assigned claim numbers 27358, 30710,  
24 and 30720 (hereinafter collectively referred to as the "Proofs of Claim"), seeking damages on behalf  
25 of Creditors from the Camp Fire.  
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1           6.       Since the filing of the Proofs of Claim, irreconcilable differences have developed  
2 between Creditors and Dreyer Babich to such an extent that the attorney-client relationship has  
3 broken down and is no longer sustainable.  
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5           7.       The irreconcilable differences make it impossible for Dreyer Babich and I to continue  
6 to represent the Creditors.  
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8           8.       To the extent that Creditors request that Dreyer Babich turn over any files or  
9 information to which they are entitled, Dreyer Babich will cooperate and transmit such files.  
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9. Dreyer Babich will cause the Motion, my declaration, and the Notice regarding the Motion to be served on all the known addresses for Creditors, as follows:

<b>Michael Ramey</b> P.O. Box 28379 Santa Ana, CA 92799.	<b>Michael Ramey &amp; Associates Inc.</b> Michael Ramey, MBA, CFE, SCLA P.O. Box 744, Danville, CA 94526.
<b>Michael Ramey &amp; Associates Inc.</b> Michael Ramey, MBA, CFE, SCLA P.O. Box 28379 Santa Ana, CA 92799.	<b>Michael Ramey as Trustee of the Ramey Colby 2007 Trust</b> P.O. Box 28379 Santa Ana, CA 92799.
<b>Michael Ramey &amp; Associates Inc.</b> c/o Michael Ramey Agent for Service of Process 530 La Gonda Way, Suite D Danville, CA 94526.	

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10 day of May, 2022, at Sacramento, Sacramento County, California.

Steve M. Campora